Air-Weigh

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Docket Clerk
U.S. DOT Dockets
Room PI-401
400 Seventh St., S.W.
Washington, D.C. 20590-0001

FHWA-97-2979-42

To Whom It May Concern:

Please include into the record the attached comments regarding Docket No. FHWA-97-2979 as my supplemental, written testimony supporting the use of on-board trailer scales for independent shippers by the moving and storage industry.

These supplemental comments are in response to several requests by industry leaders to more clearly describe *how the independent shipper benefits by being able to conveniently witness the before, during and after weighing of their household goods during the loading process.*

By using on-board scales during the loading process, independent shippers would be able to confidently make *curbside moving decisions* that directly effect the cost of their move. And just as importantly, on-board scales provide the heretofore unavailable opportunity for the shipper to know exactly what the weight-based final moving charge is *before* the mover leaves the loading site.

Further reinforcing the consumer protection aspect of the proposed rule change, the independent shipper would always have the right to dispute the curbside weight during the loading process and demand a binding re-weigh on a certified scale.

By approving this opportunity for independent shippers to choose to use on-board trailer scales to determine their shipping charges, FHWA makes available new technology that will prove to be one of the most important consumer-protection advancements in the moving and storage industry.

If you have any questions, or I can be of any further assistance in explaining the use of on-board scales in the transportation industry, please feel free to contact me at 541/343-7884. Thank you.

Sincerely,

Martin Ambros
Chief Executive Officer
Air- Weigh

Docket No. FHWA-97-2979

Supplemental Comments to
Written Testimony of
Martin Ambros
Chief Executive Officer
Air-Weigh On-Board Scales
Eugene, Oregon
541/343-7884

Subsequent to my testimony regarding the use of on-board truck scales to provide independent shippers the choice of conveniently witnessing the before, during and after weighing of their household goods, I would like to comment on the actual loading procedure that is used by Air-Weigh equipped fleets and owner operators and how the scale system works. It is important to understand the significant advantage of permitting the shipper the opportunity to actually witness the before and after weighing ***on the same scale, right at the loading site.*** By continuously monitoring the weighing of their goods as they are being loaded, the shipper has the opportunity to make ship-or-not-ship decisions right at the loading site -- very important to those shippers on a weight budget, such as military personnel.

Air-Weigh is a patented weighing device that measures the air pressure in the vehicle's air suspension system. Each vehicle is calibrated by comparing the changes in its air pressure to the changes in its actual on-the-ground weights, as determined by a reliable certified platform scale. When a load is added to, or removed from, the vehicle, the vehicle automatically increases or exhausts the air pressure in the suspension to maintain the ride-height of the vehicle at its factory-specified height by means of a height control device or leveling valve. The more weight the suspension is supporting, the more air pressure required to keep it at its ride-height.

The Air-Weigh scale is connected to pressure sensor transducers that continuously monitor each suspension's air pressure. The scale's microprocessors convert these air pressure changes to a weight display that is calibrated to the specific physical characteristics of the vehicle on which it is mounted.

The shipper will be provided a brochure describing how the on-board scale operates and what is required of the driver to determine an accurate weight. They will be invited to inspect the vehicle and witness the Air-Weigh scale's Net Payload function being set to

zero before the loading process begins. In those cases where the vehicle is already partially loaded, the shipper can confidently know that only the new cargo is being weighed.

Before, during and after weights should always be conducted with the vehicle in the same weighing circumstances, with the motor running, and the vehicle's suspension system fully inflated to ride-height. The shipper will know the vehicle' suspension is fully inflated when the scale's weight display stabilizes. At that time, a weight receipt can be printed. The weight receipt will show date and time stamps, individual axle weights, the gross vehicle weight and the Net Payload weight change, as determined from when the scale was set to zero before loading or unloading.

The driver signs the weight receipt and attests that the weight is the result of properly operating the scale and vehicle during the weighing process. The independent shipper then has the opportunity to sign the weight receipt and accept the weight as accurate. If the shipper disputes the weight, a demand for re-weigh on a certified scale can be made right then, rather than days and miles later.

And because the before-and-after weighing is done on the same on-board scale, *and is based on the net change in payload,* the accuracy of the weight display is much more accurate than comparing the entire vehicle weight on two different certified platform scales.

In summary, on-board weighing provides several advantages and benefits for independent shippers:

- By having access to real-time weight information, the shipper can make loading decisions based on shipping budget.
- It eliminates potential confusion and suspicion about what portion of the load is the shipper's responsibility.
- The driver can provide a signed, printed weight receipt immediately upon completion, so the shipper has a firm cost of moving before the driver leaves the loading site.
- The shipper always has the right to disagree with the curbside weight and demand a certified re-weigh.

- End -